

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

HILTON EMILIO RIVERA REYES

DEBTOR

CASE NO 19-02694 ESL

CHAPTER 13

**DEBTOR'S MOTION REQUESTING EXTENSION OF TIME TO FILE CHAPTER
13 SCHEDULES AND PLAN AND OTHER REQUIRED DOCUMENTS**

TO THE HONORABLE COURT:

COMES NOW, HILTON EMILIO RIVERA REYES, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On May 14, 2019, the Debtor filed a voluntary petition under Chapter 13 of the Bankruptcy Code, 11 U.S.C. Sections 1301 *et. seq.*

2. That the aforementioned bankruptcy filing was an "emergency filing" since a real property owned by the Debtor located at Bedford, Massachusetts, USA, was scheduled for a public auction for May 17, 2019.

3. That after the bankruptcy petition was filed, the Debtor had to travel out of Puerto Rico and was unable to meet with his attorney in order to prepare and file the pending documents, schedules and Chapter 13 Plan, in the above captioned case.

4. That the Chapter 13 Schedules, statement of affairs, payment advices, statement of current monthly income and disposable income calculation, and the Chapter 13 Plan, have become due.

5. That the Debtor respectfully requests additional time within to prepare the aforementioned schedules, statements and plan.

6. That the Debtor needs twenty-one (21) days to prepare and file the pending chapter 13 schedules, statement of financial affairs, payment advices, statement of current monthly income and disposable income calculation Forms 122C-1 and 122c-2, and the Chapter 13 Plan, pursuant to Rule 1007(c) and 3015 of the Federal Rules of Bankruptcy Procedure. This extension of time to expire on July 15, 2019.

WHEREFORE, the Debtor respectfully prays that the present motion be granted and that this Honorable Court grant the requested extension of time.

I HEREBY CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee Jose Ramon Carrion Morales, Esq.; to the US Trustee's Office, Monsita Lecaroz Arribas, Esq., Assistant US Trustee; and also certify that I have mailed by United States Postal Service copy of this motion to the following non-participant: to the Debtor, Hilton Emilio Rivera Reyes, PO Box 8 Yabucoa PR 00767, in the above captioned case.

RESPECFULLY SUBMITTED. In San Juan, Puerto Rico, this 24th day of June, 2019.

/s/ **Roberto Figueroa Carrasquillo**
USDC #203614
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
PO BOX 186 CAGUAS PR 00726-0816
TEL 787-744-7699 FAX 787-746-5294
EMAIL: rfigueroa@rfclawpr.com